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**From:** Liz Hitchcock- Safer Chemicals [lizhitchcock@saferchemicals.org]  
**Sent:** 12/12/2017 3:47:34 PM  
**To:** Morris, Jeff [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=55c34872e6ea40cab78be910aec63321-Morris, Jeff]  
**CC:** Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Doa, Maria [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=99e502a905374b0b890db9b22e18d92e-MDoa02]; Mottley, Tanya [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33a000296a364b0dad31fb9aaa34605d-Mottley, Tanya]; Schweer, Greg [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4fe412a2024b4f548eeb02e7e931f484-GSchweer]; Mclean, Kevin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=869a9152d655420594d8f94a966b8892-KMCLEAN]; Grant, Brian [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ec6104b72cab42ba9b1e1da67d4288ae-Grant, Brian]  
**Subject:** Serious Concerns about EPA Plans to Weaken the New Chemicals Program and Request to Halt Implementation  
**Attachments:** SCHF PMN framework letter 12112017.pdf

Dear Dr. Morris:

We are writing to reinforce our deep concerns about the “framework” for new chemical review that EPA presented at its December 6 public meeting and to request that the Agency halt implementation of the framework while it reviews and addresses public comments and reexamines the framework’s legality. As explained in the attached letter, we believe the framework is contrary to the Toxic Substances Control Act (TSCA) and urge EPA to withdraw it after further analysis and consideration of public comments.

In sum, we urge EPA to put implementation of the new framework on hold indefinitely, review and respond to comments and reexamine whether the framework can be reconciled with the language and goals of TSCA. If it does nonetheless proceed with SNURs despite the illegality of the framework under TSCA, EPA should conduct a full notice-and-comment rulemaking for these rules in accordance with its SNUR regulations for new chemicals.

We ask that you respond in writing to the issues raised by this letter as soon as possible.

Please contact SCHF counsel Bob Sussman with any questions at [bobsussman1@comcast.net](mailto:bobsussman1@comcast.net).

Sincerely yours,

Liz Hitchcock, Government Affairs Director  
Safer Chemicals Healthy Families

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cc: Dr. Nancy Beck  
Dr. Maria Doa  
Tonya Mottley  
Greg Schweer  
Kevin Mclean, Esq.  
Brian Grant, Esq.

Liz Hitchcock, Government Affairs Director  
Safer Chemicals Healthy Families  
202-794-8755  
[lizhitchcock@saferchemicals.org](mailto:lizhitchcock@saferchemicals.org)  
[www.saferchemicals.org](http://www.saferchemicals.org)